

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

Case No.: 1:25-cv-23232-DPG

**JOINT MOTION TO EXTEND BRIEFING DEADLINES
IN RESPONSE TO DEFENDANTS' MOTION TO DISMISS
AND REQUEST FOR JUDICIAL NOTICE**

Plaintiff President Donald J. Trump ("Plaintiff") and Defendants Dow Jones & Company, Inc. d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo (together, "Defendants") (Plaintiff and Defendants are collectively, the "Parties"), by and through their undersigned counsel, jointly move for a short extension of the deadlines for Plaintiff to respond to Defendants' Motion To Dismiss [ECF No. 35] and Defendants' Request for Judicial Notice [ECF No. 38], and for Defendants to file their replies in support of their Motion To Dismiss and Request for Judicial Notice. In support, the Parties state as follows:

1. On September 22, 2025, Defendants filed their Motion To Dismiss [ECF No. 35].

2. Additionally, on September 23, 2025, Defendants filed their Request for Judicial Notice [ECF No. 38] asking the Court to take judicial notice of several documents in connection with its consideration of Defendants' Motion to Dismiss.

3. Currently, Plaintiff's deadline to respond to the Motion To Dismiss is October 6, 2025, and Defendants' deadline to file their reply, assuming Plaintiff files his response on October 6, 2025, will be October 13, 2025. Additionally, Plaintiff's deadline to respond to the Request for Judicial Notice is October 7, 2025, and Defendants' deadline to file their reply, assuming Plaintiff files his response on October 7, 2025, will be October 14, 2025.

4. There is good cause for this extension. Due to the press of other urgent matters and in order to allow sufficient time to adequately address the issues raised in Defendants' Motion To Dismiss and Request for Judicial Notice, Plaintiff needs additional time to file his responses, and Defendants need additional time to file their replies.

5. As such, the Parties have agreed to extend the briefing schedule such that Plaintiff's responses in opposition to Defendants' Motion To Dismiss and Request for Judicial Notice shall be due on October 20, 2025, and Defendants' replies shall be due on November 5, 2025.

6. This short extension will allow the Parties sufficient time to properly address the issues raised in Defendants' Motion To Dismiss and Request for Judicial Notice in their respective responses and replies.

7. The Parties have not proposed this extension for the purposes of delay. Further, given the relatively short extension of time requested, the proposed extension will not prejudice the Court or any of the Parties.

8. Accordingly, the Parties have filed this joint motion and believe that good cause exists for the Court to grant the requested extension.

WHEREFORE, the Parties respectfully request that the Court enter an Order granting this joint motion and extending the deadline for Plaintiff to file his responses to Defendants' Motion To Dismiss and Request for Judicial Notice to October 20, 2025, extending the deadline for Defendants to file their replies to November 5, 2025, and for such other relief the Court deems proper. A proposed order granting this joint motion is attached hereto as **Exhibit A**.

Dated: October 1, 2025

Respectfully submitted,

/s/ Alejandro Brito
Alejandro Brito
Florida Bar No. 098442
Ian Michael Corp
Florida Bar No. 1010943
BRITO, PLLC
2121 Ponce de Leon Boulevard
Suite 650
Coral Gables, Florida 33134
abrito@pllc.com
icorp@britopllc.com
apiriou@britopllc.com

Counsel for Plaintiff
President Donald J. Trump

/s/ George S. Lemieux
George S. Lemieux, Esq.
Timothy J. McGinn, Esq.
Eric C. Edison, Esq.
Gunster, Yoakley & Stewart, P.A.
450 E. Las Olas Blvd., Suite 1400
Fort Lauderdale, FL 33301
glemieux@gunster.com
tmcginn@gunster.com
eedison@gunster.com

Katherine M. Bolger, Esq.*
Amanda B. Levine, Esq.*
Meenakshi Krishnan, Esq.*
Davis Wright Tremaine, LLP
1251 Avenue of the Americas, 21st Floor
New York, New York 10020
katebolger@dwt.com
amandalevine@dwt.com
meenakshikrishnan@dwt.com

Andrew J. Levander, Esq.*
Steven A. Engel, Esq.*
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036
andrew.levander@dechert.com
steven.engel@dechert.com

*Admitted *pro hac vice*

Counsel for Defendants Dow Jones & Company, Inc., d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch, Robert Thomson, Khadeeja Safdar, and Joseph Palazzolo